

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JAN 27 2020

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

Roanoke DIVISION

JULIA C. DUDLEY, CLERK  
BY: A. Boesen  
DEPUTY CLERK

Conley James Dowell

Plaintiff(s),

v.

Civil Action No.: 7:20CV55  
(To be assigned by Clerk of District Court)

Western Regional Jail  
Catawba Mental Hospital  
Roanoke Memorial Hospital  
Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.

Please attach additional sheets if necessary).

COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number. Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name: Conley James Dowell

Address: 721 Flamingo Rd., Bassett, Va. 24055

Telephone Number: 276-226-3447

b. Plaintiff No. 2

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: Jane Doe (unknown) Western Regional Jail

Address: 5885 W River Rd., Salem, Va. 24153

b. Defendant No. 2

Name: Jane Doe (unknown) Catawba Hospital

Address: 5525 Catawba Hospital Dr., Catawba, Va. 24070

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

**JURISDICTION**

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☒ Federal Question

☐ Diversity of Citizenship

☐ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

Civil rights violation, Police Brutality,  
medical malpractice

C. Defendant No. 3 Jane Doe (unknown)  
Roanoke Memorial Hospital  
1906 Belleview Ave. SE, Roanoke, VA.  
24014

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Plaintiff No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

**Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached. ☐**

#### STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. I was incarcerated in Salem, Virginia for lack of payment on child support. I was transferred to Western Regional Jail. During that time I was poisoned with Barium in my food and Barium blown in my lungs with the fan outside my cell in classification strip cell. I have evidence to support my allegation. I went to Roanoke Memorial Hospital. On the 19th of September 2017 I was transferred to Catawba Hospital for six hours where they gave me six unknown injections. They stated,

theres no way you will live through all the shots we gave you. "make your peace with God and go." I woke at midnight in Central State Hospital. I was there approximately three weeks where they continued blowing Barium salt in my face waking me up at night. I was transferred back to Western Regional Jail around three weeks later. The female warden and all the staff that worked in classification knew what was going on. I need. to subpoena staff, pictures and names to include all that is responsible. Upon arrival they strip me naked, turn the air down and let me sleep on the concrete all night with no mattress in classification area. then they transferred me to cell 18 also in classification area where they cut my water off and I was forced to drink my own urine.. Female doctor came in and talked me into drinking some water that was laced with something that caused me to bleed out of my abdominal aorta. My blood pressure was extremely low only because they had some type of machine that could read all my vitals and internal organs... just like an MRI machine.. They didn't take me back to the hospital for two more days.

They tried to use the hydro bomb system to cause me to go in cardiac arrest because my blood pressure was so low, but it wouldn't force the hot water to come out of the toilet, so they just filled the room with the gas that ignites the system. It was so bad I felt like my jugular was about to explode. They took me out to the hospital at Roanoke Memorial Hospital. My body was filled with so much gas that they had to suction a little blood out of my arm to test it. I stayed there for about 12 hours then I was sent back to Central State Hospital. I remained there for about two weeks and sent back to Western Regional Jail where my family posted \$960 to be released. Immediately after my release I went back to Roanoke Memorial Hospital to have myself check out and they tried to put me in the mental hos-ward of the hospital again to cover up this conspiracy.

Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached. ☐

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I am seeking five hundred million  
dollars... for pain/suffering and mental  
abuse.

DEMAND FOR JURY TRIAL:

☒ YES

☐ NO

Signed this 27 day of Jan, 2020.

Signature of Plaintiff No. 1

Cathy J. Connor

Signature of Plaintiff No. 2

**NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.**